



Jackson Lewis P.C.
Poydras Center
650 Poydras Street, Suite 1900
New Orleans LA 70130
(504) 208-1755 Direct
(504) 208-1759 Fax
jacksonlewis.com

January 27, 2021

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Michelle Bilello, et al. v. Estée Lauder Inc., et al., No. 1:20-cv-04770-JMF (S.D.N.Y.)

Dear Judge Furman:

Pursuant to Section 7(C)(ii) of the Court's Individual Practices in Civil Cases, Section 6 of SDNY's Electronic Case Filing Rules & Instructions, Defendants respectfully submit this letter motion to allow Defendants to file their Reply Memorandum in Support of its Motion to Dismiss under seal and in redacted form.

Defendants wish to file the above document under seal and in redacted form because it contains proprietary information regarding the amount The Estée Lauder Companies 401(k) Savings Plan ("Plan") paid in recordkeeping fees to Aon Hewitt, the predecessor to Alight Solutions ("Alight"), the Plan's current recordkeeper. The agreement between Estée Lauder and Aon Hewitt expressly states, "To protect the confidential and proprietary information included in this material, it may not be disclosed."

On December 10, 2020, Defendants filed a similar letter motion requesting this Court grant leave to file Defendants' Memorandum of Law in Support of its Motion to Dismiss (Dkt. No. 35) and Exhibit 15 attached to the Declaration of René E. Thorne (Dkt. No. 31-15) to remain publicly available in redacted form and to remain sealed in its unredacted form (Dkt. Nos. 32 and 33) on the Court's docket.

On December 21, 2020, Alight submitted a letter, pursuant to the Court's December 11, 2020 Order (Dkt. No. 36), requesting that the Court maintain the redaction and sealing of Alight's pricing information to protect its confidential, proprietary, and sensitive information as "[d]isclosure of such information would cause irreparable harm to Alight in regard to its competitors and clients, which outweighs any interest in public access to the information."

On December 22, 2020, this Court issued an Order that the respective documents will remain in redacted form, and that the Court will evaluate whether to maintain the redaction when deciding the underlying motion. (Dkt. No. 38).

The information Defendants seek to redact and file under seal in their Reply Memorandum in Support of their Motion to Dismiss contains the same confidential, proprietary, and sensitive information at issue in Defendants' December 10, 2020 Letter Motion: the amount of recordkeeping fees paid by the Plan to Alight.

Accordingly, Defendants respectfully request that the Court grant this request.

Respectfully submitted,

s/ René E. Thorne

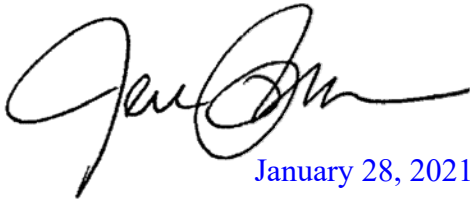
René E. Thorne

(504) 208-5827 Direct

Rene.Thorne@jacksonlewis.com

Jackson Lewis P.C.

Application GRANTED on a temporary basis. The Court will evaluate whether to whether to maintain the redactions on a permanent basis when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 49. SO ORDERED.



January 28, 2021